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Inc.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MEDIDATA SOLUTIONS, INC.	:	ALC
	:	
Plaintiff,	:	
v.	:	
	:	
FEDERAL INSURANCE COMPANY,	:	
	:	
Defendant.	:	
-----	:	

AFFIDAVIT OF GLENN WATT

STATE OF New York)
) ss:
COUNTY OF New York)

Glenn Watt, being duly sworn, deposes and states as follows:

1. I am Vice President, Corporate Information & Security for Medidata Solutions, Inc. ("Medidata"). I have held this position since 2007. I make this affidavit based on my personal knowledge and review of documents available to me as they are kept in the ordinary course of Medidata's business.
2. Medidata uses Google's Gmail platform for its corporate email system.

3. Medidata employees have email addresses with the domain name “mdsol.com,” not “gmail.com.” Preceding “@mdsol.com”, Medidata employees’ email addresses generally consist of their first initial and last name; for example, my email address is gwatt@mdsol.com.

4. When a person emails a Medidata employee at their Medidata email address, the message goes to Google computer servers, where it is processed and then stored on those servers.

5. Google’s servers that process and store Medidata’s email constitute input, output, processing, storage, off-line media library and communication facilities that are utilized by Medidata, and are connected to computers that are owned and operated by Medidata.

6. Medidata employees access Google’s servers continuously throughout the day to process their email activity.

7. After an incoming email is processed, Google’s servers then enable it to be displayed in the Medidata employee’s email account, which can then be accessed by Medidata employees on computers owned by Medidata at Medidata’s offices.

8. When the information in an incoming email is processed by Google’s servers, the Gmail system displays the sender’s name, if known, and email address in angle brackets in the “From” line of the email. For example, Gmail would display an email from me with “Glenn Watt <gwatt@mdsol.com>” in the “From” line.

9. One feature of Gmail is that Google’s email system will compare an incoming email’s sender’s email address to all Medidata employee profiles contained in its system for a match.

10. If Google’s Gmail system matches the email address of a sender with a Medidata employee account, it will display the sender’s full name in the “From” line of the email. Furthermore, if a picture has been added to that Medidata employee’s account, the email system

will automatically display that picture next to the sender's name and email address in the "From" line.

11. Google's Gmail system will not, however, automatically add an electronic signature to emails based on the address of the sender. Instead, each individual Medidata employee has the option to add an electronic signature to that employee's emails. Then, only emails initiated from that employee's actual Gmail account will automatically attach the selected electronic signature.

12. Under my supervision, Medidata employees in my department searched the records of all emails sent from the Google Gmail account of Medidata [REDACTED] associated with the email address [REDACTED]. As a result of that effort, I have determined that [REDACTED] did not send the emails received by [REDACTED] and [REDACTED] at 11:12 AM, 3:32 PM, and 3:52 PM on September 16, 2014, that gave the appearance of coming from [REDACTED] and bore his picture.

By: *Patricia M. Moscato*

Sworn to before me on this 11 day of August, 2015

Patricia M. Moscato
Notary Public

PATRICIA M. MOSCATO
Notary Public, State of New York
No. 01MO6286705
Qualified in Kings County
Commission Expires July 29, 2017

